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## REMARKS

Claims 19-22 are currently pending in the application. Claim 19 is an independent claim. Reconsideration and withdrawal of all pending rejections in view of the following remarks is respectfully requested.

### ***35 U.S.C. § 102 Rejection***

Claims 19-21 are rejected under 35 U.S.C. § 102(e) as being anticipated by U. S. Patent No. 6,323,051 issued to Shimada. This rejection is respectfully traversed.

In this regard, Shimada merely discloses that reference numeral 107 of Shimada is a pixel electrode. Because reference numeral 107 is a pixel electrode, the pixel electrode must be made of a transparent conductive material. Accordingly, referring to figure 7 of Shimada, since what is formed under an insulating layer is reference numeral 107 which is a transparent conductive layer, a layer enclosed by the insulating layer 108 is a transparent conductive layer 107, not a metal electrode.

Also, the Examiner contends that the 107 layer appears to be substituted with a layer corresponding to reference numeral 106 in figure 7 of Shimada. However, according to columns 1 to 3 of the specification of Shimada, the 107 layer cannot be substituted with the 106 layer. That is, if the 107 layer is a pixel electrode, the 106 layer is apparently different from the 107 layer since the 106 layer is a source metal film. Nevertheless, stating that the 107 layer is a pixel electrode, the Examiner insists that the 106 layer can be substituted for the 107 layer and the 106 layer is a metal electrode enclosed by the insulating layer 108. Therefore, according to the Examiner, the layer 106 and the layer 107 can be positioned at the same position. Applicants respectfully

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assert that one of ordinary skill would not modify Shimada in this manner because it would be illogical in that the layer 106 is clearly different from the layer 107.

Moreover, Shimada also discloses that the layer 106 is a source metal film and the layer 107 is a transparent electrode (see figures 5A to 5D). Also, column 2, lines 1 to 10 of the detailed description directed to figure 7 of Shimada describe a source metal film 106, a transparent conductive film 107, and a protection film 108 that are layered sequentially from bottom to top in this order.

Therefore, since a source metal film 106 must be positioned under a transparent conductive film 107, an edge portion of the source metal film 106 is completely covered by the transparent film 107, and the transparent film 107 is covered by an insulating film 108 (protection film 108), the edge portion of the source metal film 106 cannot be exposed to the outside. Accordingly, pixel shrinkage due to exposure of the metal edge portion and contact of the exposed metal with an organic material (for example, an organic light emitting layer) cannot occur in Shimada.

Moreover, claim 19 sets forth in pertinent part that an insulation film is formed over the insulation substrate having an *opening portion* and the pixel electrode extends from a portion of the transparent conductive layer forming any one of the source/drain electrodes and is exposed through the *opening portion* of the insulation film.

To the contrary, this feature is not shown by Shimada. Shimada discloses a pixel electrode 126 that is not shown Figure 7. The Shimada pixel electrode is shown in Figure 6 and moreover is not disclosed with any sort of opening portion.

On the other hand, one aspect of the invention shown in Figure 4F, is shown having a pixel electrode 265 positioned in an opening 266.

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Furthermore in the present invention, dual layered source/drain electrodes are formed of metal/transparent electrodes, and the transparent electrodes extend from the source/drain electrodes and form a pixel electrode. In this structure, if the metal electrode contacts an organic light-emitting layer formed on the pixel electrode, the organic light-emitting layer is degraded. Accordingly, the metal electrode must be insulated from the organic light-emitting layer. Thus, an insulation film (passivation layer) coats the metal electrode to prevent contact with the organic light-emitting layer.

In this regard, Shimada'051 does not disclose such an insulation film coating the metal electrode.

Because the applied reference of Shimada fails to disclose each and every element recited in the claims, as noted above, in independent claim 19, Applicants respectfully request that the rejection of claims 19-21 be withdrawn.

With regard to dependent claims 20 and 21, Applicants assert that these claims are allowable on their own merit and at least because they depend on independent claim 19, which Applicants submit has been shown to be allowable.

### **35 U.S.C. § 103 Rejection**

Claim 22 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Shimada in view of U. S. Patent No. 5,895,692 to Shirasaki, et al. ("Shirasaki"). This rejection is moot because claim 22 depends on independent claim 19, which Applicants submit has been shown to be allowable.

Accordingly, Applicants request that the rejection of claim 22 be withdrawn for at least the reasons noted-above.

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In view of the fact that none of the art of record, whether considered alone or in any proper combination, discloses or suggests the invention as defined by the pending claims, and in further view of the above remarks, reconsideration of the Examiner's action and allowance of the present application are respectfully requested and are believed to be appropriate.

Applicants have made a sincere effort to place the present application in condition for allowance and believe that they have now done so. Applicants have pointed out the specific language of Applicants' claims that define over the references of record and respectfully request an indication to such effect, in due course.

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## CONCLUSION

In view of the foregoing remarks, Applicants submit that all of the rejections have been overcome, and that the claims are patentably distinct from the prior art of record and in condition for allowance. The Examiner is respectfully requested to pass the above application to issue, and to contact the undersigned at the telephone number listed below, if needed. Applicants hereby make a written conditional petition for extension of time, if required. Please charge any deficiencies in fees and credit any overpayment of fees to **Deposit Account No. 23-1951 (McGuireWoods)**.

Respectfully Submitted,



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